

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., et al.

Plaintiffs,

v.

LAWRENCE HOGAN, et al.

Defendants.

Case No. 1:16-cv-03311-MJG

CONSENT MOTION AND ORDER FOR EXTENSION OF TIME

Comes now, the Plaintiffs, by and through undersigned counsel, pursuant to Fed. Rule Civ. Proc. 6(b), hereby respectfully submit this Consent Motion and Order for Extension of Time in which to respond to Defendants Lawrence Hogan and William M. Pallozzi's Motion to Dismiss filed in the above-captioned action, and in support thereof, states the following:

1. Defendants Lawrence Hogan and William M. Pallozzi's Motion to Dismiss was filed on or about December 2, 2016.
2. Plaintiff's response to Defendant Lawrence Hogan and William M. Pallozzi's Motion to Dismiss is due on or about December 19, 2016.
3. Due to an unusually busy litigation schedule, the Plaintiff requires more time to complete his response.
4. Defendants, Lawrence Hogan and William M. Pallozzi, through counsel, Matthew J. Fader, Esquire, consent to this extension of time to file a response to the Motion to Dismiss.
5. The Plaintiff has offered Defendants Lawrence Hogan and William M. Pallozzi a two-week extension for time to file their Reply in Opposition to Motion to Dismiss.

Defendants Lawrence Hogan and William M. Pallozzi, through counsel, Matthew J. Fader, Esquire, have agreed to this extension.

WHEREFORE, the Plaintiffs, Maryland Shall Issue, *et al.*, respectfully request for an Order extending the time up through and including **January 3, 2016** to respond to Defendants Lawrence Hogan and William M. Pallozzi's Motion to Dismiss.

Respectfully submitted,

Hansel Law, P.C

/s/ Cary Hansel
Cary J. Hansel
2514 North Charles Street
Baltimore, Maryland 21218
301/461-1040 (tel.)
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion for Extension of Time was served via electronic mail through PACER on this 14th day of December, 2016 upon the following:

Matthew J. Fader, Esquire
Jennifer L. Katz, Esquire
Assistant Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, MD 21202
410/576-7906 (tel.)

/s/ Cary Hansel
Cary Hansel

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ORDER

Upon consideration of the Plaintiffs' Consent Motion for Extension of Time in which to respond to the Defendant Lawrence Hogan and William M. Pallozzi's Motion to Dismiss, it is this _____ day of _____, 2016, by the United States District Court for the District of Maryland,

ORDERED that the Motion for the Extension of time is hereby **GRANTED**; and it is further

ORDERED that the Plaintiffs' response to Lawrence Hogan and William M. Pallozzi's Motion to Dismiss is due **January 3, 2016**; and it is further

ORDERED that the Defendants' Reply to Plaintiff's Opposition to Defendant Lawrence Hogan and William M. Pallozzi's Motion to Dismiss is due **January 16, 2016**.

Judge, United States District Court for the
District of Maryland